

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

OYSTER OPTICS, LLC,  
Plaintiff

v.

INFINERA CORPORATION, CORIANT  
(USA) INC., CORIANT NORTH  
AMERICA, LLC, and CORIANT  
OPERATIONS, INC.,

Defendants.

Civil Action No. 2:19-cv-00257

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL DEADLINES  
AND NOTICE OF SETTLEMENT**

Pursuant to the Court's June 3, 2014 Standing Order Regarding Proper Notification of Settlement to the Court, Plaintiff Oyster Optics, LLC and Defendants Infinera Corporation, Coriant (USA) Inc., Coriant North America, LLC, and Coriant Operations, Inc. (collectively, "Parties"), hereby notify the Court that they have reached an agreement in principle that will resolve all matters in controversy in the above captioned action. Therefore, the Parties respectfully request that all deadlines between them in the above-captioned litigation be stayed for thirty (30) days, up to and including Monday, June 21, 2020, to give the Parties adequate time to file appropriate dismissal papers upon execution of the long-form settlement agreement. There is good cause to stay all deadlines in view of the Parties' settlement of all claims, counterclaims, and defenses. The Parties request this stay, not for the purposes of any delay, but so that they may finalize the long-form settlement agreement and file dismissal papers without incurring additional expenses. A proposed order is attached.

Respectfully Submitted,

/s/ T. John Ward, Jr.

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*Coriant Operation, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 20<sup>th</sup> day of May, 2021.

/s/ T. John Ward, Jr.